

Exhibit B

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October 17, 2023

Special Agent Thomas E. Wilbert
Department of Homeland Security
c/o HSI New York
601 W. 26th Street
Room 726
New York, NY 10001

Re: Mr. Alberto Matta

Dear Special Agent Wilbert:

We write on behalf of our client, Mr. Alberto Matta, whose cellphone and laptop DHS seized on October 7, 2023, as noted in Receipt 1365975, which lists you as the point of contact. Thank you for your October 13 12:26 pm email (copy attached), by which you advised that Mr. Matta's cellphone would be sent back to him, but his laptop would continue to be detained. In both our email to which you responded, and in our reply to your email, we requested a telephone conversation to discuss this matter, but you have not responded to that request.

We seek that conversation because we have serious concerns that Mr. Matta's rights have been and continue to be violated by the seizure, detention and search of his electronic devices. We hereby request that you advise us whether DHS has made a copy of any information contained in the cellphone or the laptop; whether it has searched or otherwise reviewed the contents of either device or intends to do so in the future; and what the legal basis is for the detention, and for any current or planned copying or search or other inspection of the contents of the devices.

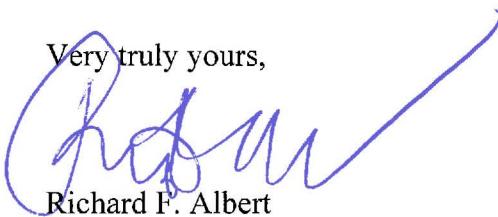
We hereby provide notice that no valid basis exists for any search of the contents of the devices, and we request the opportunity, in advance of any search (or any further search), to address any evidence DHS may have received suggesting otherwise. We request the immediate return of the contents of the devices and all copies thereof, in addition to the physical devices themselves. We also hereby request copies of any warrant or other documents that you may contend provide legal authorization for the seizure and any search.

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We further provide notice that both devices contain extensive communications and other information protected by the attorney-client privilege and work-product doctrine. Mr. Matta and his employer, Optimum Asset Management, S.A., fully assert those protections and all other privileges that apply to the contents of the devices.

We reiterate our request to speak with you or any prosecutor or other attorney involved in this matter who can address our concerns. We would hope that DHS would respond to this request for a conversation rather than force us to take legal action pursuant to Fed. R. Crim. P. 41(g) and otherwise.

Very truly yours,

Richard F. Albert